

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

<div>PRICE MCMAHON, <i>et al.</i>, on behalf of themselves and all others similarly situated,</div> <div style="text-align: center;">Plaintiffs,</div> <div>v.</div> <div>VOLKSWAGEN GROUP OF AMERICA, INC., <i>et al.</i>,</div> <div style="text-align: center;">Defendants.</div>	Civil Action No. 2:22-cv-01704 (EP) (JSA)
<div>MIKE SHERROD and MICHAEL FULBRIGHT, on behalf of themselves and all others similarly situated,</div> <div style="text-align: center;">Plaintiffs,</div> <div>v.</div> <div>VOLKSWAGEN GROUP OF AMERICA, INC,</div> <div style="text-align: center;">Defendant.</div>	Civil Action No. 2:22-cv-01537 (EP) (JSA)

WHEREAS, On March 18, 2022, Plaintiffs Mike Sherrod and Michael Fulbright filed a class action complaint against Volkswagen Group of America, Inc. (“VWGoA”) alleging state and federal consumer fraud claims based on an alleged defect in the wiring harness of VW Atlas vehicles;

WHEREAS, On March 25, 2022, Plaintiffs Price McMahon, *et al.*, filed a class action complaint against VWGoA, Volkswagen Aktiengesellschaft (“VWAG”), and Volkswagen Group of America Chattanooga Operations, LLC (“VWCOL”) (collectively “Defendants”)

alleging state and federal consumer fraud claims based on an alleged defect in the wiring harness of VW Atlas vehicles;

WHEREAS, on July 7, 2022, counsel on behalf of Plaintiffs and VWGoA in both actions submitted a joint letter to request a schedule for a Consent Motion for Consolidation followed by the filing of a single Consolidated Amended Complaint (“CAC”) and a response to or motion to dismiss the CAC (“Letter Request”);

WHEREAS, on July 13, 2022, Honorable Jessica S. Allen so ordered the Letter Request and entered a timetable permitting Plaintiffs to file this Consent Motion to Consolidate;

WHEREAS, all parties agree that these two lawsuits involve common issues of law and fact, and consolidation will enable more efficient case management by the Court and avoid unnecessary costs and delays by avoiding duplicative discovery and motion practice in each case;

WHEREAS, all parties that have appeared in these two related actions consent to this motion to consolidate.

THIS MATTER having been opened to the Court by counsel for Plaintiffs, in the presence of all counsel of record, and the Court having read the papers, and on notice to counsel for Defendants, and good cause appearing,

IT IS THIS 19th day of July, 2022

ORDERED as follows:

1. Pursuant Fed. R. Civ. P. 42(a), the Actions, *McMahon, et al. v. Volkswagen Group of America, Inc., et al.*, No. 2:22-cv-01704 (EP) (JSA) and *Sherrod, et al. v. Volkswagen Group of America, Inc.*, 2:22-cv-01537 (EP) (JSA), are hereby consolidated for all purposes.

2. The Clerk shall establish a Docket for the Actions under Civil Action No. 2:22-cv-01537 (EP) (JSA). All papers filed in the Actions shall be filed on the Docket and shall bear the caption:

Sherrod et al. v. Volkswagen Group of America, Inc., et al. -----
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Master Docket. No. 2:22-cv-01537 (EP) (JSA)

3. Plaintiffs shall file a Consolidated Amended Complaint on or before ~~July 18,~~ August 5, 2022.

4. Defendant VWGoA shall file a response to the Consolidated Amended Complaint on or before September 16, 2022. In the event Defendant VWGoA files a motion to dismiss the Consolidated Amended Complaint, Plaintiffs shall file their response on or before October 21, 2022, and Defendant VWGoA shall file its reply on or before November 10, 2022.

**IT SO ORDERED.**

s/ Evelyn Padin, U.S.D.J.  
HONORABLE EVELYN PADIN  
UNITED STATES DISTRICT JUDGE